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September 5, 2024

**VIA ECF**

The Honorable Rachel P. Kovner  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: *In re QIWI plc Securities Litigation*, 1:20-cv-06054 (RPK) (CLP)

Dear Judge Kovner:

We write on behalf of defendants QIWI plc, Andrey Protopopov, Sergey Solonin, Boris Kim, Alexander Karavaev, Varvara Kiseleva, and Vladislav Poshmorga (“Moving Defendants”) in connection with their pending motion to dismiss Plaintiff’s Consolidated Second Amended Class Action Complaint. (ECF Nos. 85-89.)

In their motion to dismiss briefing, the Moving Defendants relied upon Judge Kuntz’s decision in *In re Telefonaktiebolaget LM Ericsson Securities Litigation*, 675 F. Supp. 3d 273 (E.D.N.Y. 2023), which dismissed securities fraud claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934. (*See* MTD Br. at 3, 14, 18, 19, 23; Reply Br. at 9.) On September 3, 2024, the United States Court of Appeals for the Second Circuit affirmed that decision. *Boston Ret. Sys. v. Telefonaktiebolaget LM Ericsson*, No. 23-940-cv, 2024 WL 4023842 (2d Cir. Sept. 3, 2024). A copy of the Second Circuit’s Summary Order is enclosed for the Court’s reference.

Respectfully submitted,

/s/ Alexander C. Drylewski  
Alexander C. Drylewski

cc: All counsel of record

Enclosure